

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

2005 AUG 31 P 3:10

THE GOVERNMENT'S MOTION TO FILE
AUTOMATIC DISCOVERY EIGHT DAYS LATE

The United States of America, by Michael J. Sullivan, United States Attorney for the District of Massachusetts, respectfully requests that it be permitted to file its automatic discovery eight days late. In support of this motion the government states the following:

1. The government's automatic discovery was due on August 23, 2005.

2. Undersigned counsel for the government has been preparing for a six week trial scheduled to commence on September 12, 2005 and, as a result, needed additional time to prepare automatic discovery in this case.

WHEREFORE, the government respectfully requests permission

to file its discovery on August 31, 2005, eight days late.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By:

Ariane D. Vuono
Ariane D. Vuono
Assistant U.S. Attorney

Dated: August 31, 2005

CERTIFICATE OF SERVICE

Hampden, ss.

Springfield, Massachusetts
August 31, 2005

I, Ariane D. Vuono, Assistant U.S. Attorney, do hereby certify that I have served a copy of the foregoing by mail on Edward B. Fogarty, Esq., 101 State Street, Suite 321, Springfield, MA 01103, and Myles Jacobson, Esq., 52 Mulberry Street, Springfield, MA 01103.

Ariane D. Vuono
Ariane D. Vuono
Assistant U.S. Attorney